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Toho Co., Ltd.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Case No.: 25-80131

In Re 17 U.S.C. § 512(h) Subpoena to  
X CORP.

**DECLARATION OF HIROYUKI  
NAKAJIMA IN SUPPORT OF SUBPOENA  
TO OBTAIN THE IDENTITY OF AN X  
CORP. CUSTOMER PURSUANT TO 17  
U.S.C. § 512(h)**

I, Hiroyuki Nakajima, declare as follows:

1. I am an attorney with the law firm Tokyo Flex Law Office, copyright counsel for Toho Co., Ltd. (“Toho”). I make this declaration in support of Toho’s request for the clerk of the District Court for the Northern District of California to issue the subpoena filed concurrently herewith pursuant to the Digital Millennium Copyright Act (DMCA), 17 U.S.C. § 512(h). I have personal knowledge of the facts stated in this Declaration and if called to do so, would testify competently thereto.

2. I am duly authorized by Toho to make this request on Toho’s behalf.

3. Toho is a Japanese corporation engaged in the business, among other things, of producing and releasing “anime” TV series (i.e., various animated, Japanese-language television series), including the series “My Hero Academia: Vigilantes” and “The Apothecary Diaries.”

4. Toho is the copyright holder for the original works that are being infringed.

